

UNITED STATES BANKRUPTCY COURT FOR THE
MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	:	NO. 1-19-04599
James Edward Hawk	:	
	:	
Debtor	:	Chapter 7
	:	
STEVEN M. CARR, TRUSTEE	:	
Movant	:	
	:	
v.	:	
	:	
SELENE FINANCE	:	
Respondent	:	

MOTION TO SELL REAL ESTATE SITUATE AT
345 PINE GROVE ROAD, UNION TOWNSHIP, ADAMS COUNTY, PA
FREE AND CLEAR OF LIENS AND ENCUMBRANCES
PURSUANT TO 11 U.S.C. § 363

AND NOW, comes Steven M. Carr, Trustee, by his attorneys, the law firm of Ream, Carr, Markey & Woloshin, LLP, and files this Motion, of which the following is a statement:

1. Movant is the duly appointed Trustee in this matter.
2. Respondent is Selene Finance, PO Box 422039, Houston, TX 77242-2039 and 9990 Richmond Avenue, Suite 400 South, Houston, Texas 77042, the holder of a secured claim by virtue of a recorded mortgage.
3. Debtor is the owner of realty situate at 345 Pine Grove Road, Union Township, Adams County, PA.
4. It is believed that the realty is subject to the following liens and encumbrances:

Mortgages

Selene Finance
Approximate Balance \$230,000.00

5. The Trustee has received an offer from Carolyn A. Hughes, to purchase the real property for \$189,000.00. The purchaser has no connection nor association with the Debtor.
6. Trustee has agreed to accept \$189,000.00 pursuant to the terms of an executed Agreement of Sale between the Trustee and the Purchaser, which Trustee believes is in the best interests of the estate, as it represents the fair market value of the property.
7. Normal and customary settlement expenses, including but not limited to transfer tax will be first paid from the proceeds generated from the sale, and all past due property taxes, sewer/refuse/water bills will be satisfied and the current bills will be prorated to settlement. The balance of the proceeds after expenses of sale will be first distributed to the secured creditors, if any, in their order of priority, with the remaining proceeds being held for the benefit of unsecured creditors.
8. Trustee will carve-out \$7,500.00 total from the sale proceeds to be held for the benefit of unsecured creditors, including administrative expenses; thus the sale will result in proceeds being available for the benefit of unsecured creditors.

WHEREFORE, Trustee requests this Honorable Court to enter an Order permitting the sale of the above-said realty.

Ream, Carr, Markey, Woloshin & Hunter, LLP

/S/ Steven M. Carr
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